

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SONTERRA CAPITAL MASTER FUND, LTD.,
HAYMAN CAPITAL MANAGEMENT, L.P., AND
CALIFORNIA STATE TEACHERS'
RETIREMENT SYSTEM, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

UBS AG, UBS SECURITIES JAPAN CO. LTD.,
MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., THE SUMITOMO
TRUST AND BANKING CO., LTD., THE
NORINCHUKIN BANK, MITSUBISHI UFJ
TRUST AND BANKING CORPORATION,
SUMITOMO MITSUI BANKING
CORPORATION, RESONA BANK, LTD., J.P.
MORGAN CHASE & CO., JPMORGAN CHASE
BANK, NATIONAL ASSOCIATION, J.P.
MORGAN SECURITIES PLC, MIZUHO
CORPORATE BANK, LTD., DEUTSCHE BANK
AG, DB GROUP SERVICES UK LIMITED,
MIZUHO TRUST AND BANKING CO., LTD.,
THE SHOKO CHUKIN BANK, LTD., SHINKIN
CENTRAL BANK, THE BANK OF YOKOHAMA,
LTD., SOCIÉTÉ GÉNÉRALE SA, THE ROYAL
BANK OF SCOTLAND GROUP PLC, THE
ROYAL BANK OF SCOTLAND PLC, RBS
SECURITIES JAPAN LIMITED, RBS
SECURITIES INC., BARCLAYS BANK PLC,
BARCLAYS PLC, BARCLAYS CAPITAL INC.,
CITIBANK, NA, CITIGROUP, INC., CITIBANK,
JAPAN LTD., CITIGROUP GLOBAL MARKETS
JAPAN, INC., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A., HSBC
HOLDINGS PLC, HSBC BANK PLC, LLOYDS
BANKING GROUP PLC, LLOYDS BANK PLC,
ICAP PLC, ICAP EUROPE LIMITED, R.P.
MARTIN HOLDINGS LIMITED, MARTIN
BROKERS (UK) LTD., TULLETT PREBON PLC,
BANK OF AMERICA CORPORATION, BANK OF
AMERICA, N.A., MERRILL LYNCH
INTERNATIONAL, AND JOHN DOES NOS. 1-50,

Defendants

DOCKET NO. 15-cv-05844-GBD

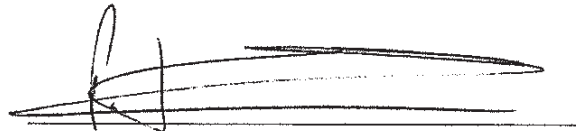
DECLARATION OF PATRICK
GONSALVES
IN SUPPORT OF
BARCLAYS PLC'S
MOTION TO DISMISS THE
COMPLAINT FOR LACK OF
PERSONAL JURISDICTION

I, Patrick Gonsalves, declare under penalty of perjury as follows:

1. I am Deputy Company Secretary for Barclays PLC in London, England.
2. I submit this declaration in support of Barclays PLC's Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned action. The facts stated herein are true and correct, to the best of my knowledge, based on records maintained by Barclays PLC in the ordinary course of business.
3. Except where otherwise indicated, all statements concern facts as of July 24, 2015, and describe the operations of only Barclays PLC, not any separately incorporated and distinct subsidiary entities.
4. Barclays PLC is a bank holding company, pursuant to Section 8(a) of the International Banking Act of 1978, and is incorporated under the laws of England and Wales.
5. Barclays PLC has its registered office in London, England. It has no other offices.
6. Barclays PLC is registered as a financial holding company with the Federal Reserve Bank of New York pursuant to the Bank Holding Company Act of 1956, 12 U.S.C. § 1841 *et seq.*
7. Barclays PLC owns no real estate and holds no leases for real property in the United States.
8. Barclays PLC has no employees in the United States.
9. Barclays PLC sponsors Level 1 American Depositary Receipts within the United States.
10. Barclays PLC does not broker trades or employ interdealer brokers.
11. Barclays PLC is not a Yen LIBOR panel member.

12. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief, based on records maintained by Barclays PLC in the ordinary course of business.

Executed in London, England on 14 January 2016.



Patrick Gonsalves